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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION TO
EXCLUDE OTTO TRUCKING'S
DAMAGES EXPERT JAMES
MALACKOWSKI PURSUANT TO RULE
702**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal confidential information in its Motion to Exclude Otto Trucking’s Damages Expert James
8 Malackowski Pursuant to Rule 702 and *Daubert* (“Waymo’s Administrative Motion”). Waymo’s
9 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion (“Waymo’s Motion”)	Highlighted in Blue	Defendants
Exhibit 1 to Waymo’s Motion	Highlighted in Blue	Defendants

13 3. Waymo’s Motion and exhibits contain information that Defendants have designated as
14 confidential and/or highly confidential.

15 4. Waymo takes no position on the merits of sealing Defendants’ designated material, and
16 expects Defendants to file one or more declarations in accordance with the Local Rules.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is
18 true and correct, and that this declaration was executed in San Francisco, California, on September 16,
19 2017.

20 By /s/ Lindsay Cooper
21 Lindsay Cooper
22 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven